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CHUNGHWA PICTURE TUBES (MALAYSIA)
SDN. BHD.

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 3:07-CV-5944 SC
MDL No. 1917

This Document Relates To:

All Indirect Purchaser Actions

Sharp Electronics Corp., et al. v. Hitachi Ltd., et al., No. 13-cv-1173;

Sharp Electronics Corp., et al. v. Koninklijke Philips Elecs. N.V., et al., No. 13-cv-02776;

[continued on next page]

**DECLARATION OF RACHEL S. BRASS
IN SUPPORT OF DEFENDANTS' JOINT
OPPOSITIONS TO DIRECT ACTION
PLAINTIFFS' MOTIONS IN LIMINE
NOS. 1-18 AND INDIRECT PURCHASER
PLAINTIFFS' MOTIONS IN LIMINE
NOS. 2, 3, 8, 9, 12, 13, 15, 16, & 18**

1 *Siegel v. Hitachi, Ltd., et al.*, No. 11-cv-05502;
2 *Siegel v. Technicolor SA, et al.*, No. 13-cv-05261;
3 *Best Buy Co., et al. v. Hitachi, Ltd., et al.*,
4 No. 11-cv-05513;
5 *Best Buy Co., et al. v. Technicolor SA, et al.*, No.
6 13-cv-05264;
7 *Target Corp. v. Chunghwa Picture Tubes, Ltd., et*
8 *al.*, No. 11-cv-05514;
9 *Target Corp. v. Technicolor SA, et al.*, No. 13-cv-
10 05686;
11 *Sears, Roebuck and Co. and Kmart Corp. v.*
12 *Chunghwa Picture Tubes, Ltd., et al.*, No. 11-cv-
13 05514;
14 *Sears, Roebuck and Co. and Kmart Corp. v.*
15 *Technicolor SA, et al.*, No. 13-cv-05262;
16 *Viewsonic Corp. v. Chunghwa Picture Tubes,*
17 *Ltd., et al.*, No. 14-cv-02510.

1 I, Rachel S. Brass, hereby declare as follows:

2 1. I am a partner in the law firm of Gibson, Dunn & Crutcher LLP, counsel of record for
3 Chunghwa Picture Tubes, Ltd. and Chunghwa Picture Tubes (Malaysia) Sdn. Bhd. (collectively,
4 “Chunghwa”) in the above-referenced action.

5 2. I submit this declaration in support of Defendants’ Joint Oppositions to Direct Action
6 Plaintiffs’ Motions in Limine Nos. 1-18 and Indirect Purchaser Plaintiffs’ Motions in Limine Nos. 2,
7 3, 8, 9, 12, 13, 15, 16, & 18 (“Joint MIL Oppositions”). This declaration and accompanying exhibits
8 are submitted on behalf of all Defendants joining the Joint MIL Oppositions, not specifically on
9 behalf of Chunghwa except to the extent Chunghwa joins in the Joint MIL Oppositions as noted in
10 the omnibus brief.

11 3. Unless otherwise indicated, I have personal knowledge of the foregoing and could and
12 would testify to the same if called as a witness in this matter.

13 4. Attached as **Exhibit 1** is a true and correct copy of cited excerpts from the certified
14 transcript of August 1, 2013 trial proceedings in the case *In re: TFT-LCD (Flat-Panel) Antitrust*
15 *Litigation*.

16 5. Attached as **Exhibit 2** is a true and correct copy of cited excerpts from the certified
17 transcript of May 22, 2012 trial proceedings in the case *In re: TFT-LCD (Flat-Panel) Antitrust*
18 *Litigation*.

19 6. Attached as **Exhibit 3** is a true and correct copy of cited excerpts from the certified
20 deposition transcript of Mike Ray, which took place on October 2, 2014.

21 7. Attached as **Exhibit 4** is a true and correct copy of cited excerpts from the certified
22 deposition transcript of Timothy Furey, which took place on July 30, 2014.

23 8. Attached as **Exhibit 5** is a true and correct copy of cited excerpts from the certified
24 deposition transcript of Andrew P. Shulklapper, which took place on July 8, 2014.

25 9. Attached as **Exhibit 6** is a true and correct copy of cited excerpts from the certified
26 deposition transcript of Roger Teel, which took place on August 28, 2014.

27 10. Attached as **Exhibit 7** is a true and correct copy of cited excerpts from the certified
28 deposition transcript of Philip Britton, which took place on August 27, 2014.

1 11. Attached as **Exhibit 8** is a true and correct copy of cited excerpts from the certified
2 deposition transcript of Yuuichi Kumazawa, which took place on May 29, 2013.

3 12. Attached as **Exhibit 9** is a true and correct copy of cited excerpts from the certified
4 deposition transcript of Tomoyuki Kawano, which took place on October 29, 2014.

5 13. Attached as **Exhibit 10** is a true and correct copy of cited excerpts from the certified
6 deposition transcript of Ayumu Kinoshita, which took place on February 6, 2013.

7 14. Attached as **Exhibit 11** is a true and correct copy of cited excerpts from the certified
8 transcript of August 29, 2013 trial proceedings in the case *In re: TFT-LCD (Flat-Panel) Antitrust*
9 *Litigation*.

10 15. Attached as **Exhibit 12** is a true and correct copy of cited excerpts from the certified
11 deposition transcript of David Dowdy, which took place on August 20, 2014.

12 16. Attached as **Exhibit 13** is a true and correct copy of cited excerpts from the certified
13 deposition transcript of Steven Ganz, which took place on April 4, 2012.

14 17. Attached as **Exhibit 14** is a true and correct copy of cited excerpts from the certified
15 deposition transcript of Barry Kushner, which took place on March 2, 2012.

16 18. Attached as **Exhibit 15** is a true and correct copy of cited excerpts from the certified
17 deposition transcript of Patricia Andrews, which took place on November 7, 2012.

18 19. Attached as **Exhibit 16** is a true and correct copy of cited excerpts from the certified
19 deposition transcript of Toshito Nakanishi, which took place on July 30, 2014.

20 20. Attached as **Exhibit 17** is a true and correct copy of Exhibit 5545 used in the
21 deposition of Wendy Fritz on August 20, 2014.

22 21. Attached as **Exhibit 18** is a true and correct copy of cited excerpts from the certified
23 deposition transcript of Joshua D. Will, which took place on August 19, 2014.

24 22. Attached as **Exhibit 19** is a true and correct copy of cited excerpts from the certified
25 deposition transcript of Wendy Fritz, which took place on August 20, 2014.

26 23. Attached as **Exhibit 20** is a true and correct copy of Exhibit 5544 used in the
27 deposition of Wendy Fritz on August 20, 2014.
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24. Attached as **Exhibit 21** is a true and correct copy of cited excerpts from the certified transcript of August 5, 2013 trial proceedings in the case *In re: TFT-LCD (Flat-Panel) Antitrust Litigation*.

25. Attached as **Exhibit 22** is a true and correct copy of Exhibit 7537 used in the deposition of Mike Ray on October 2, 2014.

26. Attached as **Exhibit 23** is a true and correct copy of cited excerpts from the certified deposition transcript of Dr. Alan Frankel, which took place on October 24, 2014.

27. Attached as **Exhibit 24** is a true and correct copy of cited excerpts from the certified deposition transcript of Brian Stone, which took place on May 22, 2014.

28. Attached as **Exhibit 25** is a true and correct copy of cited excerpts from the certified transcript of June 13, 2012 trial proceedings in the case *In re: TFT-LCD (Flat-Panel) Antitrust Litigation*.

29. Attached as **Exhibit 26** is a true and correct copy of cited excerpts from the certified transcript of April 25, 2012 pretrial proceedings in the case *In re: TFT-LCD (Flat-Panel) Antitrust Litigation*.

30. Attached as **Exhibit 27** is a true and correct copy of cited excerpts from the certified transcript of December 14, 2010 proceedings in the case *In re Static Random Access Memory (SRAM) Antitrust Litigation*.

31. Attached as **Exhibit 28** is a true and correct copy of cited excerpts from the certified deposition transcript of Jing Song Lu, which took place on February 27, 2013.

32. Attached as **Exhibit 29** is a true and correct copy of cited excerpts from the certified deposition transcript of Kyung Chul Oh, which took place on November 20, 2013.

33. Attached as **Exhibit 30** is a true and correct copy of cited excerpts from the certified deposition transcript of Jim Smith, which took place on December 12, 2013.

34. Attached as **Exhibit 31** is a true and correct copy of cited excerpts from the certified deposition transcript of Chih Chun-Liu, which took place on February 21, 2013.

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Executed this 27th day of February 2015, at San Francisco, California.

DECLARATION OF RACHEL S. BRASS IN SUPPORT OF DEFENDANTS' JOINT MOTION IN LIMINE OPPOSITIONS
MASTER CASE No. 07-CV-5944 SC

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DECLARATION OF SERVICE

I, Joseph Hansen, declare as follows:

I am employed in the County of San Francisco, State of California; I am over the age of eighteen years and am not a party to this action; my business address is 555 Mission Street, Suite 3000, San Francisco, California, 94105, in said County and State. On the date below, I served the within:

**DECLARATION OF RACHEL S. BRASS IN SUPPORT OF DEFENDANTS' JOINT
OPPOSITIONS TO DIRECT ACTION PLAINTIFFS' MOTIONS IN LIMINE NOS. 1-
18 AND INDIRECT PURCHASER PLAINTIFFS' MOTIONS IN LIMINE NOS. 2, 3, 8,
9, 12, 13, 15, 16, & 18**

to all named counsel of record as follows:

☒ **BY ECF (ELECTRONIC CASE FILING):** I e-filed the above-detailed documents utilizing the United States District Court, Northern District of California's mandated ECF (Electronic Case Filing) service on February 27, 2015. Counsel of record are required by the Court to be registered e-filers, and as such are automatically e-served with a copy of the documents upon confirmation of e-filing.

I certify under penalty of perjury that the foregoing is true and correct, that the foregoing document(s) were printed on recycled paper, and that this Declaration of Service was executed by me on February 27, 2015, at San Francisco, California.

/s/ Joseph Hansen
Joseph Hansen

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